

January 1, 2024

The Honorable Chief Judge Laura Taylor Swain  
 United States District Court Southern District of New York  
 500 Pearl Street  
 New York New York, 10017 -1312  
 Civil Action No. 18-cv-0993 Trombetta vs. Novocin and WorthPoint Corporation

**Re: 1) Plaintiff's Apology Letter to The Honorable Judge Laura Taylor Swain**  
**2) Plaintiff's Proposed Motion ECF 531- NO new facts. All documents were previously filed.**

To The Honorable Judge Laura Taylor Swain :

In light of Your Honor's statements in ECF 535, Plaintiff respectfully sets forth a letter of apology. My letter hopes to clarify my intentions for my Proposed Motion in ECF 531, which was to seek permission to file under seal two documents produced to me by WorthPoint during Discovery. The two WorthPoint documents were noted in the last paragraph of ECF 531. On December 18, 2023, WorthPoint did not produce these two documents to Your Honor related to Your request *"any other evidence from WorthPoint, that was redacted to protect proprietary information."* In ECF 531, I acknowledge requesting if I could file new exhibits regarding my financial losses and health issues resulting from this lawsuit, which Your Honor denied. I recognize how my initial intention went awry. As a Pro Se Plaintiff, please accept my sincere apologies to Your Honor for this confusion. I note however the content and exhibits in ECF 531 are not new.

Prior to writing ECF 531, I consulted Your Honor's website rules and contacted the Pro Se office. I was twice advised to state what I wanted to file under seal in a Proposed Motion and to explain the reasons for my requests. I asked if I could include exhibits. My Motion described twelve examples, with supporting exhibits in ECF 531. All content was previously filed with the Court during Discovery or during Summary Judgment. Plaintiff did not submit any new facts in my Proposed Motion in ECF 531.

Previous case docket Nos. related to my twelve exhibits in my Proposed Motion in ECF 531 are in filings : ECF 33, page 20 which is EX. #1 in ECF 531. On June 8th in 2022, in ECF 232, I filed the full *Terapeak vs Rosen 2015* case summary, which was EX.#4 in ECF 531. On June 13, 2022, in ECF 235 and on June 16, 2022 in ECF 237, I filed letters regarding the length of biography in WorthPoint's ad verses on my website. As noted on December 19, 2023 in ECF 531, I filed ECF 274, which is a letter pertaining to the difference between a licensing and sub licensing agreement. I extracted from my summary judgment and Motion in *Limone* docketed on April 19, 2023, statements from ECF 439, ECF 441, ECF 443 and ECF 446 and WorthPoint's dates and emails related to EX.#3 in ECF 531. On April 28, 2023, in ECF 457, the same evidence in ECF 531 as EX. #11 is also in ECF 457. On June 7, 2023 in ECF 496, there are more documents and claims of the alleged date, month and year WorthPoint added its 1972 oil painting webpage to its website noted in ECF 531. In Plaintiff Second Amended Complaint in ECF 348, the same exhibits from WorthPoint's Georgia case are also noted in EX #12 in ECF 531. Plaintiff's Discovery evidence Nos. range from 000001 to 000861. WorthPoint's Motion of Entry for Default Judgment in Ga. filed on October 31, 2022 and its impossible claim I filed a response on November 5, 2022 was electronically stamped by WorthPoint's New York attorneys and numbered *Plaintiff 000832*, *Plaintiff 000833* and *Plaintiff 000834*, therefore WorthPoint's New York attorneys are aware of the facts in its Georgia lawsuit. On June 29, 2023, in ECF 517, as Exhibit #9, I filed the full phone transcript between Plaintiff and WorthPoint employee Greg Watkins. Pages from this phone transcript are in EX #8 and #9 in ECF 531. In ECF 518, Plaintiff noted my exclusive copyrights to my biography. In ECF 523, Your Honor granted permission for me to file ECF 526 and 527. I filed WorthPoint's Georgia lawsuit documents in in ECF 526 on August 1, 2023. Since these documents were previously filed beforehand, I assumed I could summarize its content in WorthPoint's twelve examples of false statements throughout litigation in support of my Proposed Motion in ECF 531.

Last, I ask Your Honor to kindly review ECF 364 filed on February 1, 2023. Magistrate Judge Cave, extended the expert Discovery deadline to March 1, 2023. I did file further documents till this deadline.

Once again, I wish Your Honor a Happy New Year. I thank you for your consideration regarding my case and what is now an ordeal, to protect my name, identity, brand, self authored bio and authentic artistic oeuvre.

Pro Se Plaintiff  
Annamarie Trombetta  
175 East 96th Street (12 R)  
New York, New York 10128

Respectfully Submitted,

———— Electronic Signature ————

/s/ Annamarie Trombetta     January 1, 2024

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Annamarie Trombetta